

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
Amy Stash

Debtor

NO. 23-21612 JCM

M&T Bank

CHAPTER 13

Related to Docs. 30

Movant

v.

Amy Stash

Respondent

and

Ronda J. Winnecour, Trustee

Additional Respondent

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, M&T Bank held a loan secured by a mortgage on Debtor's real property located at 117 Richmond Street Loyalhanna, PA 15661;

WHEREAS, as foreclosure action was initiated, and a final judgment of foreclosure was entered.

WHEREAS, 117 Richmond Street Loyalhanna, PA 15661 was sold at Sheriff Sale on July 3, 2023.

WHEREAS, Debtor and other occupants (Levi Stash and Zachary Stash) are currently still residing in the property.

WHEREAS, both parties have agreed to enter a Stipulation for Cash for Keys to which the Debtor will vacate the real property.

It is therefore Stipulated and agreed as follows:

1. The only occupants of 117 Richmond Street Loyallhanna, PA 15661 are: Amy Stash, Levi Stash and Zachary Stash (hereinafter "occupants").
2. Beginning December 1, 2023, Debtor and all occupants have agreed to vacate the real property on or before Thursday, February 1, 2024.
3. In rem relief from the automatic stay is hereby granted; however, M&T shall not schedule an eviction date prior to February 1, 2024.
4. Real property should be left in broom swept condition to which any remaining articles left in property shall be deemed abandoned and M&T may immediately dispose of them in any manner it sees fit.
5. Debtor shall forward an executed IRS W-9 to counsel for creditor within 30 days of this order. A check will not be issued to debtor is a W-9 has not been received.
6. Movant's real estate broker will meet the debtor and occupants at the property on February 1, 2024 (or earlier as agreed by the parties) to inspect and walk through the property.
7. Once the inspection is complete, the real estate broker shall provide the Debtor a check in the amount of \$4,000.00.

Consented to by:

/s/ Lawrence W. Willis, Esquire

Lawrence W. Willis, Esquire

PA ID No. 85299

Willis & Associates

Attorney for Debtor

201 Penn Center, Suite 310

Pittsburgh, PA 15235

Phone: 412-235-1721

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/s/ Brian C. Nicholas, Esquire

Brian C. Nicholas, Esquire

PA ID No. 317240

KML Law Group, P.C.

Attorney for Movant

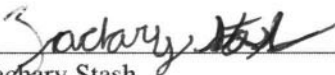
701 Market Street, Suite 5000

Philadelphia, PA 19106

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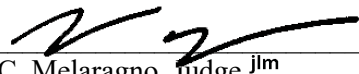
Other occupants in residence 18 years of age and above:

  
Zachary Stash

  
Levi Stash

On this 10 day of December, 2023, it is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,

  
John C. Melaragno, Judge jlm  
United States Bankruptcy Court

SIGNED  
12/18/23 11:26 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA